

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

Kevin P. Loughman,

Plaintiff,

v.

Maura Mahoney, Maura Feeley, Lotus  
Development Corporation, and First Security  
Services Corporation,

Defendants.

CIVIL ACTION NO. 04 CV 12316 WGY

**AFFIDAVIT OF COUNSEL IN SUPPORT OF DEFENDANTS MAURA FEELEY &**  
**FIRST SECURITY SERVICES CORPORATION'S MOTION AND SUPPORTING**  
**MEMORANDUM TO STAY PROCEEDINGS**

I, Shireen G. Arani, hereby depose and say:

1. I am attorney-of-record for Defendants Securitas Security Services USA, Inc. as successor to First Security Services Corporation (“Securitas”), and Maura Feeley (collectively, “Defendants”).
2. The Plaintiff, Kevin P. Loughman, is proceeding *pro se* in this action.
3. On December 10, 2004, the Plaintiff served upon me, as counsel for the Defendants, his Urgent Motion for 90 Day Continuance, a copy of which is attached as Exhibit A to the Defendants’ Motion to Stay Proceedings, submitted herewith. On December 15, 2004, this Court docketed said motion.
4. The Plaintiff’s motion requests that the Court continue all required actions with respect to this matter for 90 days. As grounds for this motion, the Plaintiff states that he is

temporarily hospitalized in London, England and is awaiting open heart surgery, after which, the recovery period is expected to be 60 to 90 days. The Plaintiff has also attached a doctor's letter in support of his motion. *See Exhibit A to Defendants' Motion to Stay Proceedings.*

5. Just prior to receipt of the Plaintiff's motion, I received a telephone voicemail message from a woman identifying herself as "Judy," the Plaintiff's niece. The woman stated that she was calling on behalf of the Plaintiff, to communicate that there had been a "medical development out of the country." She stated that the Plaintiff was currently "unreachable" and did not provide any contact information for herself.

6. I have spoken to counsel for the other named defendants, Lotus Development Corporation and Maura Mahoney, and have been informed that there has been no service made upon either party to date.

Signed under the penalties of perjury this 20<sup>th</sup> day of December, 2004.



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